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UNITED STATE DISTRICT COURT

DISTRICT OF NEVADA

**STATE FARM LIFE INSURANCE
COMPANY, and Illinois Corporation,**

Plaintiff,

vs.

**THE ESTATE OF CATHERINE
NEIGHBORS; CASHA KAUFER,**
Individually, and as Representative of the
Estate of Catherine G. Neighbors;
MICHAEL ROBERT DOUGLAS,
Individually and as Representative of the
Estate of Catherine G. Neighbors;
**LAURA DRUCKER, SUSAN
COSSETTE; DOES I THROUGH X;**
and **ROE CORPORATIONS XI
THROUGH XX,** inclusive,

Defendants.

CASHA KAUFER, Individually, and as
Representative of the Estate of Catherine
G. Neighbors; **MICHAEL ROBERT
DOUGLAS,** Individually and as

Case No.: 3:19-cv-00658-LRH-WGC

**STIPULATION TO PARTICIPATE
IN SETTLEMENT CONFERENCE
AND FOR STAY OF ALL
DISCOVERY DEADLINES**

(FIRST REQUEST)

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1 Representative of the Estate of Catherine
2 G. Neighbors,

3 Counterclaimants,

4 vs.

5 **STATE FARM LIFE INSURANCE**
6 **COMPANY**, and Illinois Corporation,

7 Counterdefendant.

8 **THE ESTATE OF CATHERINE**
9 **NEIGHBORS; CASHA KAUFER**,
10 Individually, and as Representative of the
11 Estate of Catherine G. Neighbors; and
12 **MICHAEL ROBERT DOUGLAS**,
Individually and as Representative of the
Estate of Catherine G. Neighbors

13 Cross-Claimants,

14 vs.

15 **LAURA DRUCKER**, individually, and
16 **SUSAN COSSETTE**, individually,

17 Cross-Defendants.

18 **LAURA DRUCKER**, individually, and
19 **SUSAN COSSETTE**, individually,

20 Cross-Claimants,

21 vs.

22 **THE ESTATE OF CATHERINE**
23 **NEIGHBORS; CASHA KAUFER**,
24 Individually, and as Representative of the
25 Estate of Catherine G. Neighbors; and
26 **MICHAEL ROBERT DOUGLAS**,
Individually and as Representative of the
Estate of Catherine G. Neighbors

27 Cross-Defendants.
28

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1 Defendants/Cross-Defendants/Cross-claimants Laura Drucker and Susan
2 Cossette, by and through their counsel of record, McClure Wallace, Esq. and Patrick
3 Millsap, Esq. of Wallace & Millsap, Defendants/Counterclaimants/Cross-Defendants
4 Casha Kaufer and Michael Robert Douglas, by and through their counsel of record,
5 Therese Shanks, Esq. of Robison, Sharp, Sullivan Brust, and
6 Plaintiff/Counterdefendant State Farm Life Insurance Company, by and through its
7 legal counsel of record Michael A. Pintar, Esq. of McCormick, Barstow, Sheppard,
8 Wayte & Carruth (hereby collectively referred to as the "Parties"), hereby stipulate
9 to participate in a settlement conference, and stay discovery deadlines subject to the
10 outcome of a settlement conference in this matter. More specifically the Parties agree
11 as follows:

- 12 1. The Parties agree to participate in a settlement conference before the
13 Honorable Carla Baldwin. The Parties identify Judge Baldwin as an
14 agreeable officiant for a settlement conference given the early stage of this
15 matter to ensure Judge Cobb is able to address any and all discovery
16 disputes that could arise in the future.
- 17 2. The Parties agree to contact Judge Baldwin's chambers within 10 days of
18 the entry of an order approving this stipulation and schedule a settlement
19 conference within 120 days. The 120-day time frame is presented not to
20 cause delay, but simply to allow the Parties some flexibility in scheduling
21 the settlement conference given the unique circumstances presented by the
22 COVID-19 pandemic, as well as to allow for the collection of pertinent
23 medical records.
- 24 3. All discovery deadlines are stayed, but the Parties may continue discovery
25 as they deem appropriate.
- 26 4. In the event the settlement conference is unsuccessful, the Parties agree to
27 contact chambers within 10 days for the purpose of resetting all applicable
28 discovery deadlines.

1 This is the Parties' first request to stay or otherwise continue the discovery
2 deadlines in this matter. Counsel certify this request is made for good-cause and not
3 for the purpose of undue delay.

4
5 DATED: May 28, 2020.

6 WALLACE & MILLSAP

7
8 By: /s/ F. McClure Wallace.

9 F. McClure Wallace, Esq.

10 State Bar No.: 10264

11 Patrick R. Millsap, Esq.

12 Nevada Bar No.: 12043

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15 *Attorneys for Defendants Laura Drucker*
16 *and Susan Cossette*

17
18 DATED: May 28, 2020.

19 ROBISON, SHARP, SULLIVAN &
20 BRUST

21 By: /s/ Therese M. Shanks.

22 Therese M. Shanks, Esq.,

23 SBN 12890

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25 Reno, NV 89503

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27 Tel: (775) 329-3151

28 *Attorneys for Casha Kaufer*

Michael Douglas

DATED: May 28, 2020

McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH

By: /s/ Michael A. Pintar.

Michael A. Pintar, Esq.

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Company

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1 **ORDER**

2 The Court hereby grants the Parties' Stipulation to Participate in a Settlement
3 Conference and Request for Stay of Discovery Deadlines. The Parties shall have 120
4 days after entry of this Order to participate in a Settlement Conference before the
5 Honorable Carla Baldwin, unless a longer period of time is needed to schedule
6 the settlement conference to accommodate Judge Baldwin's calendar. All
7 scheduling order deadlines are **VACATED** to be re-set 120 days from the date of
8 this order.

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11 **IT IS SO ORDERED.**

12 Dated this 28th day of May, 2020.

13 *William G. Cobb*

14 _____
15 United States Magistrate Judge
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